

**UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF DELAWARE**

JOSEPH D'ALESSANDRO and OLGA  
D'ALESSANDRO,

Plaintiffs,

v.

PROGRESSIVE NORTHERN  
INSURANCE COMPANY,

Defendant.

C.A. No. 1:06-cv-548-GMS

**REQUEST FOR ENLARGEMENT OF  
TIME TO ANSWER OR OTHERWISE  
PLEAD PURSUANT TO  
RULE 12**

**ELECTRONICALLY FILED**

**MOTION FOR ENLARGEMENT OF TIME**

Defendant Progressive Northern Insurance Company hereby requests that the Clerk enter an Order for Enlargement of Time for Defendant to answer or otherwise respond to the Plaintiffs Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure. Defendant is in the process of filing a Motion to Dismiss based on the Plaintiffs failure to state a cause of action against Defendant upon which relief may be granted.

WHEREFORE, defendant Progressive Northern Insurance Company requests the Clerk to enter an enlargement of time to answer or otherwise plead pursuant to Rule 12 of the Federal Rules of Civil Procedure.

By: /s/ Michael I. Silverman  
Michael I. Silverman, Esquire  
DE Bari ID: 3034  
SILVERMAN, McDONALD &  
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**ORDER**

**AND NOW**, this \_\_\_\_\_ day of \_\_\_\_\_, 2006, upon Application for  
Enlargement of Time of Default Judgment and Time for Defendant to answer or otherwise  
respond to the Plaintiffs Complaint pursuant to Rule 12 of the Federal Rules of Civil Procedure,  
it is hereby **ORDERED** that the Defendant has \_\_\_\_\_ days to Answer the Complaint.

BY THE COURT:

\_\_\_\_\_  
J.

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v.

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C.A. No. 1:06-cv-548-GMS

**REQUEST FOR ENLARGEMENT  
OF TIME TO ANSWER OR  
OTHERWISE PLEADE PURSUANT TO  
RULE 12**

**ELECTRONICALLY FILED**

**CERTIFICATE OF SERVICE**

This is to certify that on November 3, 2006, a copy of the foregoing Request for an Order for Enlargement of Time to Answer or Respond on behalf of the Defendant Pursuant to Rule 12 of the Federal Rules of Civil Procedure was filed electronically.

I hereby certify that on November 3, 2006, a true and correct copy of the foregoing Request for Order of Enlargement of Time to Answer or Otherwise Plead Pursuant to Rule 12 of the Federal Rules of Civil Procedure was served by U.S. first class mail, postage prepaid, upon the following:

Joseph D'Alessandro and Olga D'Alessandro  
Plaintiffs Pre-Se  
23136 Prince George Drive  
Angola Estates  
Lewes, DE 19958-9342

By: /s/: Michael I. Silverman  
Michael I. Silverman, Esquire  
DE Bari ID: 3034  
SILVERMAN, McDONALD &  
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